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July 1, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

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RE: Registration No.:

Dear Administrator Leavitt:

We at FMC Corporation have supported EPA's HPV Challenge Program from its onset. We believe in the principle that requires basic screening for each of the HPV chemicals and have sponsored the HPV chemicals imported or manufactured by FMC Corporation. Over the past five years, we have reviewed existing data, developed robust summaries, developed test plans and conducted new testing when deemed appropriate.

Two of the chemicals FMC Corporation sponsored are listed below:

Methyl 3,3-dimethyl-4, pentenoate
CAS No.: 63721-05-1

Methyl 4,6,6,6-tetrachloro-3,3-dimethylhexanoate
CAS No.: 64667-33-0

In our December 30, 2002 submission for these chemicals, we included robust summaries developed from existing data and test plans for missing data requirements. However, at this time, FMC Corporation no longer manufactures or imports either of these chemicals and has no plans to in the future. For this reason, we do not believe conducting the additional tests identified in our test plans would be an appropriate allocation of human, animal and financial resources. Therefore, please consider our submission based on existing data to be final.

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Natalie Rutherford
Global Regulatory Manager
FMC Corporation
Phone: 215-299-6680